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9 *Attorneys for Plaintiff*
10 *IMPLICIT NETWORKS, INC.*

11 *Additional Counsel Listed on Signature Pages*

12 UNITED STATES DISTRICT COURT
13 FOR THE NORTHERN DISTRICT OF CALIFORNIA
14 SAN FRANCISCO DIVISION

15 IMPLICIT NETWORKS, INC.,

16 Plaintiff,

17 v.

18 F5 NETWORKS, INC.,

19 Defendant.

Case No. 10-CV-3365 SI

**STIPULATION IN IMPLICIT RELATED
CASES TO CASE MANAGEMENT
SCHEDULE AND [PROPOSED] ORDER**

20 IMPLICIT NETWORKS, INC.,

21 Plaintiff,

22 v.

23 CISCO SYSTEMS, INC.,

24 Defendant.

Case No. C 10-3606 SI

1
2 IMPLICIT NETWORKS, INC.,

3 Plaintiff,

4 v.

5 HEWLETT-PACKARD COMPANY,

6 Defendant.

Case No. C 10-3746 SI

7
8 IMPLICIT NETWORKS, INC.,

9 Plaintiff,

10 v.

11 CITRIX SYSTEMS, INC.,

12 Defendant.

Case No. C 10-3766 SI

13
14 IMPLICIT NETWORKS, INC.,

15 Plaintiff,

16 v.

17 JUNIPER NETWORKS, INC.,

18 Defendant.

Case No. C 10-4234 SI

1 Plaintiff Implicit Networks, Inc. (“Implicit”) and the five defendants (Hewlett-
 2 Packard Company (“HP”), F5 Networks, Inc. (“F5”), Juniper Networks, Inc. (“Juniper”),
 3 Cisco Systems, Inc. (“Cisco”), and Citrix Systems, Inc. (“Citrix”)) in the above-captioned
 4 cases, which have been ordered related by the Court (the “Related Cases”), hereby stipulate
 5 through their respective counsel of record as follows:

6 WHEREAS, Implicit and the defendants in the several Related Cases have agreed to
 7 schedules which include most events occurring on the same dates for all cases;
 8

9 WHEREAS, the Initial Case Management Conferences for the *HP*, *F5* and *Juniper*
 10 cases took place on February 18, 2011, and the Court at that time ordered a schedule for
 11 those three cases; and

12 WHEREAS, the Initial Case Management Conferences for the *Cisco* and *Citrix* cases
 13 took place on February 25, 2011, at which time, the Court directed counsel for Implicit to
 14 prepare a stipulation that set forth, in one place, the case management dates for all of the
 15 Related Cases;
 16

17 WHEREFORE IT IS HEREBY STIPULATED by and between Implicit and the
 18 defendants in each of the Related Cases that the case management dates set forth in the
 19 attached Exhibit A shall be ordered in these cases.

20 Dated: March 1, 2011

Respectfully submitted:

22 HOSIE RICE LLP

23 /s/ George F. Bishop
 24 George F. Bishop

25 *Attorneys for Plaintiff Implicit Networks, Inc.*

1 Dated: March 1, 2011

K&L GATES LLP

2 /s/ Shane Brun

Shane Brun

3 *Attorneys for Defendant F5 Networks, Inc.*

4
5
6 Dated: March 1, 2011

QUINN, EMANUEL, URQUHART &
SULLIVAN LLP

7 /s/ Victoria Maroulis

8 Victoria Maroulis

9 *Attorneys for Defendant Cisco Systems, Inc.*

10
11 Dated: March 1, 2011

FISH & RICHARDSON, P.C.

12 /s/ Christopher Green

13 Christopher Green

14 *Attorneys for Defendant Hewlett-Packard*
15 *Company*

16
17 Dated: March 1, 2011

GOODWIN PROCTER, LLP

18 /s/ Lana Shiferman

19 Lane Shiferman

20 *Attorneys for Defendant Citrix Systems, Inc.*

21
22 Dated: March 1, 2011

IRELL & MANELLA LLP

23 /s/ Rebecca Clifford

24 Rebecca Clifford

25 *Attorneys for Defendant Juniper Networks, Inc.*

CERTIFICATION PURSUANT TO GENERAL ORDER 45

Pursuant to General Order 45X.B, I, George F. Bishop, attest that the above signatories for the Defendants have concurred and consented to the filing of this document.

DATED: March 1, 2011

/s/ George F. Bishop

George F. Bishop

PURSUANT TO STIPULATION IT IS ORDERED THAT

The parties to this action will comply with the dates set forth in the accompanying
Stipulated Motion.

Dated: March 2, 2011



Honorable Susan Illston
U.S. DISTRICT COURT JUDGE

EXHIBIT A

Event	HP Dates	F5 Dates	Juniper Dates	Cisco Dates	Citrix Dates
Parties' Serve Initial Disclosures	2/17/11	2/17/11	2/17/11	<u>3/4/11¹</u>	<u>2/18/11</u>
Disclosure of Asserted Claims and Infringement Contentions and accompanying document production [Pat. L.R. 3.1-3.2]	3/25/11	3/25/11	<u>5/23/11</u>	3/25/11	3/25/11
Invalidity Contentions and accompanying document production [Pat. L.R. 3.3 and 3.4]	5/9/11	5/9/11	<u>7/22/11</u>	5/9/11	5/9/11
Exchange of Proposed Terms and Claim Elements for Construction [Pat. L.R. 4.1.a-b.]	8/22/11	8/22/11	8/22/11	8/22/11	8/22/11
Simultaneous Exchange of Preliminary Claim Constructions and Preliminary Identifications of Extrinsic Evidence [Pat. L.R. 4.2.a-b.]	9/19/11	9/19/11	9/19/11	9/19/11	9/19/11
Filing of Joint Claim Chart, Worksheet and Prehearing Statement [Pat. L.R. 4.3]	10/14/11	10/14/11	10/14/11	10/14/11	10/14/11
Case Management Conference	10/28/11, @ 3:00 p.m.	10/28/11, @ 3:00 p.m.	10/28/11 @ 3:00 p.m.	10/28/11 @ 3:00 p.m.	10/28/11 @ 3:00 p.m.
Completion of Claim Construction Discovery [Pat. L.R. 4.4]	11/14/11	11/14/11	11/14/11	11/14/11	11/14/11
Opening Claim Construction Brief [Pat. L.R. 4.5.a.]	11/28/11	11/28/11	11/28/11	11/28/11	11/28/11

¹ The few dates that are not uniform among all five cases are bolded and underlined.

Event	HP Dates	F5 Dates	Juniper Dates	Cisco Dates	Citrix Dates
Responsive Claim Construction Brief [Pat. L.R. 4.5.b]	12/12/11	12/12/11	12/12/11	12/12/11	12/12/11
Reply Claim Construction Brief [Pat. L.R. 4.5.c]	12/19/11	12/19/11	12/19/11	12/19/11	12/19/11
Tutorial for Claim Construction Hearing	1/10/12 @ 10:00 a.m.	1/10/12 @ 10:00 a.m.	1/10/12 @ 10:00 a.m.	1/10/12 @ 10:00 a.m.	1/10/12 @ 10:00 a.m.
Claim Construction Hearing [Pat. L.R. 4.6]	1/10/12-1/12/12 @ 10:00 a.m.	1/10/12-1/12/12 @ 10:00 a.m.	1/10/12-1/12/12 @ 10:00 a.m.	1/10/12-1/12/12 @ 10:00 a.m.	1/10/12-1/12/12 @ 10:00 a.m.